



## Department of Energy

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DEC 17 1999

Mr. James A. Saric, Remedial Project Manager  
U.S. Environmental Protection Agency  
Region V, SRF-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

DOE-0229-00

Mr. Tom Schneider, Project Manager  
Ohio Environmental Protection Agency  
401 East 5th Street  
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF RESPONSES TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY  
COMMENTS AND THE REVISED WASTE ACCEPTANCE CRITERIA ATTAINMENT REPORT  
FOR REMOVAL ACTION 17 STOCKPILES 1, 2, AND 4**

References: Letter, T. Schneider to J. Reising, "Comments - Waste  
Acceptance Criteria Attainment Report for Removal Action 17  
Stockpiles 1, 2, and 4," dated November 4, 1999

Letter, J. Saric to J. Reising, "RA 17 Stockpiles 1, 2, and 4  
WAC Report," dated November 19, 1999

Enclosed are responses to the Ohio Environmental Protection Agency (OEPA) comments on the Waste Acceptance Criteria (WAC) Attainment Report for Removal Action 17 Stockpiles 1, 2, and 4. Based on these comments, this document has been revised and a final report is also enclosed. Approval from the U.S. Environmental Protection Agency (U.S. EPA) was received for the draft report on November 22, 1999.

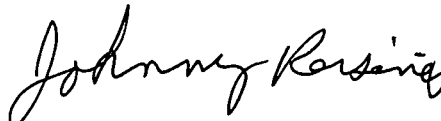
Mr. James A. Saric  
Mr. Tom Schneider

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If you have any questions or concerns regarding these responses, please contact Robert Janke at (513) 648-3124.

Sincerely,



Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:R.J. Janke

Enclosures:

cc w/enclosures:

G. Jablonowski, USEPA-V, SRF-5J  
T. Schneider, OEPA - Dayton (three copies of enclosures)  
F. Bell, ATSDR  
M. Schupe, HSI GeoTrans  
R. Vandegrift, ODH  
F. Barker, Tetra Tech  
AR Coordinator, FDF/78

cc w/o enclosures:

N. Hallein, EM-42/CLOV  
A. Tanner, OH/FEMP  
R. Abitz, FDF/52-2  
D. Carr, FDF/52-2  
J. Chiou, DFD/52-0  
T. Hagen, FDF/65-2  
J. Harmon, FDF/90  
R. Heck, FDF/2  
S. Hinnefeld, FDF/31  
C. Messerly, FDF/52-0  
T. Walsh, FDF/65-2  
W. Westerman, FDF/52-0  
ECDC, FDF/52-7

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**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS  
ON THE WASTE ACCEPTANCE CRITERIA ATTAINMENT REPORT  
FOR REMOVAL ACTION 17 STOCKPILES 1, 2, AND 4  
(20200-RP-0004, REVISION A)**

Commenting Organization: Ohio EPA

Commentor: OFFO

Section #: 1.0

Pg #: 1-1

Line #: 10-12

Code: C

Comment #: 1

Comment: This paragraph states that an addendum to this report, WAC Attainment Report for Removal Action 17 Stockpiles 1, 2, and 4, will be issued to present results on the western portion of SP-1. This is unacceptable to Ohio EPA. A separate submittal on SP-1's western portion should be issued with the results and WAC attainment determination.

Response: A separate Project Specific Plan (PSP) and WAC attainment determination report will be submitted for the western portion of SP-1.

Action: The document will be revised to reflect the response.

Commenting Organization: Ohio EPA

Commentor: OFFO

Section #: PSP Revision 0

Pg #:

Line #:

Code: C

Comment #: 2

Comment: Ohio EPA has noticed that this final revision of the PSP has many sentences and sections which were either added or changed *after* Ohio EPA approved the document. Ohio EPA approved the Revision B (March 1999) with the inclusion of the resolutions to comments. An example of one of these changes includes Section 3.0, first paragraph. The possible use of the GATOR was added. The use of the GATOR is not acceptable to the Ohio EPA, and this has been stated many times. Another example would be Section 3.1, second paragraph. The approved PSP states that physical samples will be collected if the RTRAK/RSS scan exceeds the trigger level, while the Revision 0 changes that and states that an HPGe shot will be done instead. Numerous other changes can be found throughout the document. Ohio EPA would like an explanation and justification as to why this document was changed after final approval without notifying the agencies.

Response: The PSP was revised prior to field implementation to make it consistent with the real-time scanning procedures in place at the time. Because the real-time scanning was performed using the RSS (not the GATOR) and no results exceeded the stated trigger levels, all work complied with the PSP approved by OEPA. In the future, no changes will be made to an approved PSP without notifying the Agencies.

Action: Any future changes to approved PSPs will not be implemented until the Agencies have been notified and approval of the changes has been received.